

Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2006-094
Expiration Date: DEC 21 2011
Installation ID: 201-0102
Project Number: 2002-08-042

Installation Name and Address

Manac Trailers USA Inc.
8593 State Highway 77
PO Drawer K
Oran, MO 63771
Scott County

Parent Company's Name and Address

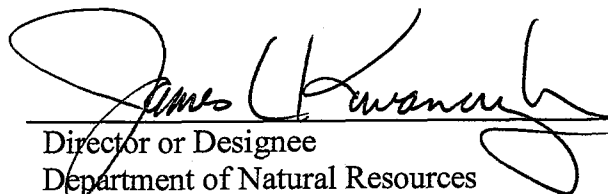
CanAm Group Inc.
270 Ch. Du Tremblay
Boucherville (Quebec) Canada J4B5X-9

Installation Description:

Manac Trailers USA Inc. manufactures trailers and surface coats them. Processes include gas metal arc welding, abrasive blasting, and surface coating.

DEC 22 2006

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Manac Trailers USA Inc. manufactures trailers and surface coats them. Processes include gas metal arc welding, abrasive blasting, and surface coating. The gas metal arc welding process began in 1992, and the surface coating process began in 1995.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.63	0.00	0.86	19.28	0.02	-	2.52
2004	0.23	-	0.80	19.47	-	-	2.26
2003	0.11	-	-	13.39	-	-	1.45
2002	0.01	-	0.03	3.47	-	-	0.49
2001	0.19	-	-	16.48	-	-	-

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	EIQ #
	<i>Welding</i>	
EU0010	Gas Metal Arc Welding	EP-01
	<i>Abrasive Blasting</i>	
EU0020	Abrasive Blasting	EP-02
	<i>Paint Spraying</i>	
EU0030	Paint Spraying	EP-03
	<i>Space Heating</i>	
EU0040	71 Natural Gas Space Heaters	EP-05
EU0050	2 Natural Gas Office Heaters	EP-05
EU0060	Propane Space Heater	EP-05

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source	EIQ #
None	

DOCUMENTS INCORPORATED BY REFERENCE

This document has been incorporated by reference into this permit.

Construction Permit 0797-017, issued May 22, 1997

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0797-017, Issued May 22, 1997

Emission Limitations:

- 1) The permittee shall not emit more than 99 tons of volatile organic compounds (VOC) in any consecutive 12-month period from the entire installation
- 2) The permittee shall not emit more than 9 tons of any single hazardous pollutant (HAP) in any consecutive 12-month period from the entire installation.
- 3) The permittee shall not emit more than 24 tons of all HAPs combined in any consecutive 12-month period from the entire installation.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of emissions of VOC emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of VOC emissions from this facility.
- 2) The permittee shall maintain an accurate record of emissions of each individual HAP emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of all individual HAP emissions from this facility.
- 3) The permittee shall maintain an accurate record of emissions of total HAPs emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of total HAP emissions from this facility.
- 4) Attachments A1, A2, B1, and B2 contain forms for these recordkeeping requirements. The permittee shall use these forms, or equivalent forms created by the permittee, for this purpose.
- 5) These records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 6) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate the source exceeded any of the three emission limitations.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – GAS METAL ARC WELDING			
Emission Unit	Description	Manufacturer/Model/Serial #	EQ #
EU0010	Gas Metal Arc Welding, MHDR = 256 lb E70S electrode/hr	Esab/SVI 450i CVCC	EP-01

PERMIT CONDITION EU0010-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0797-017, Issued May 22, 1997

Gas Metal Arc Welding (EU0010) is subject to the second and third emission limitations in Permit Condition PW001. Its HAP emissions must be reported on the forms provided in Attachments B1 and B2, or equivalent forms created by the permittee.

EU0020 – ABRASIVE BLASTING			
Emission Unit	Description	Manufacturer/Model/Serial #	EQ #
EU0020	Abrasive Blasting, MHDR = 50 lb "Black Beauty" coal slag/hr	Unknown	EP-02

PERMIT CONDITION EU0020-001

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the exhaust stack from Abrasive Blasting (EU0020) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible

emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - d) Observations must be made semi-annually. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (See Attachments C1 or C2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (See Attachment D.)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment E.)
- 4) Attachments C1, C2, D, and E contain forms for these recordkeeping requirements. These forms, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 6) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION EU0020-002

10 CSR 10-6.400 Restriction of Emissions of Particulate Matter From Industrial Processes

Emission Limitation:

The permittee shall not emit excessive particulate matter from Abrasive Blasting (EU0020). The permittee shall comply with either one of the following two limitations.

- 1) The permittee shall not emit particulate matter from Abrasive Blasting (EU0020) in excess of 0.14 pounds per hour, nor shall the permittee emit particulate matter from Abrasive Blasting (EU0020) in

a concentration exceeding 0.30 grains per cubic foot of exhaust gases. This emission rate was calculated using the following equation, which are for a process weight rate of 60,000 lb/hr or less, and process weight rate figures from the installation's 2005 Emission Inventory Questionnaire.

$$E = 4.10(P)^{0.67} = 4.10(0.0064)^{0.67} = 0.14 \text{ lb/hr}$$

where E = rate of emission in lb/hr

$$P = \text{process weight rate in ton/hr} = \left(\frac{26,760 \text{ lb Abrasive}}{2080 \text{ hr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = \frac{0.0064 \text{ ton}}{\text{hr}}$$

- 2) The permittee shall not emit particulate matter from the exhaust stack venting Abrasive Blasting (EU0020) in a concentration exceeding that shown in the table below for the flow rate of this stack. If the stack flow rate for this exhaust stack falls between two of these table entries, the allowable concentration shall be interpolated to three decimal places.

Stack Flow Rate in Standard Cubic Feet per Minute	Concentration in Grain per Cubic Foot of Exhaust Gases
7,000 or less	0.100
8,000	0.096
9,000	0.092
10,000	0.089
20,000	0.071
30,000	0.062
40,000	0.057
50,000	0.053
60,000	0.050
80,000	0.045
100,000	0.042
120,000	0.040
140,000	0.038
160,000	0.036
180,000	0.035
200,000	0.034
300,000	0.030
400,000	0.027
500,000	0.025
600,000	0.024
800,000	0.021
1,000,000 or more	0.020

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of emissions of particulate matter emitted into the atmosphere from Abrasive Blasting (EU0020). The permittee shall record the emission rate in lb/hr and the concentration in gr/ft³ for this emission unit on a monthly basis.
- 2) Attachment F contains a form for these recordkeeping requirements. The permittee shall use this form, or an equivalent created by the permittee, for this purpose.
- 3) These records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.

- 4) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate the source exceeded the emission limitation.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0030 – PAINT SPRAYING			
Emission Unit	Description	Manufacturer/ Model #	EQ #
EU0030	There is one paint spray booth. When spraying primer, its MHDR = 1.5 gal primer/hr. When spraying paint, its MHDR = 3.6 gal paint/hr. It uses a downdraft system which sends all paint residue and fumes through a woven fiberglass filter before entering a stack. The stack flow rate is 25,000 scf/min.	Homemade	EP-03

PERMIT CONDITION EU0030-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0797-017, Issued May 22, 1997

Paint Spraying (EU0030) is subject to the emission limitations in Permit Condition PW001. The VOC and HAP emissions from the primers, paints, and solvents used in these emission units must be reported on the forms provided in Attachments A1, A2, B1, and B2, or equivalent forms created by the permittee.

PERMIT CONDITION EU0030-002

10 CSR 10-6.400 Restriction of Emissions of Particulate Matter From Industrial Processes

Emission Limitation:

The permittee shall not emit excessive particulate matter from Paint Spraying (EU0030). The permittee shall comply with either one of the following two limitations.

- 1) The permittee shall not emit particulate matter from Paint Spraying (EU0030) in excess of the correctly calculated allowable emission rate on Attachment G2, nor shall the permittee emit particulate matter from Paint Spraying (EU0030) in a concentration exceeding 0.30 grains per cubic foot of exhaust gases.
- 2) The permittee shall not emit particulate matter from the exhaust stack venting Spray Painting (EU0030) in a concentration exceeding 0.067 grains per cubic foot of exhaust gases.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of emissions of particulate matter emitted into the atmosphere from Paint Spraying (EU0030). The permittee shall record the emission rate in lb/hr and the concentration in gr/ft³ for this emission unit on a monthly basis.

- 2) Attachments G1 and G2 contain forms for these recordkeeping requirements. The permittee shall use these forms, or equivalents created by the permittee, for this purpose.
- 3) These records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 4) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate the source exceeded the emission limitation.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION EU0030-003

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the exhaust stack from Spray Painting (EU0030) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - d) Observations must be made semi-annually. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the

weekly and biweekly monitoring and is doing monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (See Attachments C1 or C2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (See Attachment D.)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment E.)
- 4) Attachments C1, C2, D, and E contain forms for these recordkeeping requirements. These forms, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 6) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0040 THROUGH EU060 – SPACE HEATING			
Emission Unit	Description	Manufacturer/ Model #	EQ #
EU0040	71 Natural Gas Space Heaters, total MHDR = 10,279,000 Btu/hr	Unknown	EP-05
EU0050	2 Natural Gas Office Heaters, total MHDR = 232,000 Btu/hr	Carrier/ CK5BXA060024AAAA	
EU0060	Propane Space Heater, MHDR = 125,000 Btu/hr	Reznor/UDAP150	

PERMIT CONDITION (EU0040 THROUGH EU0060)-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0797-017, Issued May 22, 1997

Space Heating (EU0040 through EU0060) is subject to the emission limitations in Permit Condition PW001. The VOC and HAP emissions from these emission units must be reported on the forms provided in Attachments A2, B1, and B2, or equivalent forms created by the permittee.

PERMIT CONDITION (EU0040 THROUGH EU0060) - 002

10 CSR 10-3.060, Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitations:

The permittee shall not emit particulate matter from Space Heating (EU0040 through EU0060) in excess of 0.59 pounds per MMBtu. The calculation of this limitation is shown in Attachment H.

Operational Limitation

These emission units shall be limited to burning pipeline grade natural gas, liquefied petroleum gas, or any combination of these fuels.

Monitoring/Recordkeeping/Reporting:

- 1) The permittee shall maintain documentation supporting that the fuel used in these emission units is pipeline grade natural gas, liquefied petroleum gas, or any combination of these fuels.
- 2) The permittee will be in compliance with this regulation as long these emission units burn only pipeline grade natural gas, liquefied petroleum gas, or any combination of these fuels. Calculations demonstrating this are in Attachment H. Attachment H is part of this permit, and the permittee shall keep it with the rest of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. Qualified personnel shall perform all tests.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions
--

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Manac Trailers USA Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage
--

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B, and §(6)(C)3.D, and §(5)(C)3, §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Charles Dutil, Director and President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

ATTACHMENT A1
Monthly VOC Tracking Record for Primers, Paints, and Solvents
For month of _____, year of _____

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

Column 1	Column 2	Column 3	Column 4	Column 5
Material Used ¹ (Name, type)	Amount of Material Used (include units)	Density ² (lb/gal)	VOC Content by Weight (%)	VOC Emission (tons)
(b) Monthly VOC emissions (sum of [Column 5]), in tons:				

Notes

1. If more than ten VOC-containing materials are used in a single month, fill out more than one Attachment A1 page, but only fill out total line (b) on final page.
2. Density, [Column 3], is not needed if Amount of Material Used, [Column 2], is in pounds or tons.

Instructions

- (a) Choose appropriate VOC calculation method for units used:
 - 1) If Amount of Material Used is in tons, then $[\text{Column 5}] = [\text{Column 2}] \times [\text{Column 4} / 100]$.
 - 2) If it is in pounds, then $[\text{Column 5}] = [\text{Column 2}] \times [\text{Column 4} / 100] \times [0.0005]$.
 - 3) If it is in gallons, then $[\text{Column 5}] = [\text{Column 2}] \times [\text{Column 3}] \times [\text{Column 4} / 100] \times [0.0005]$.
- (b) Sum [Column 5]. Copy this figure into the first row of Attachment A2 for this month.

ATTACHMENT A2
Monthly Total VOC Tracking Record
For month of _____, year of _____

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

ID #	Description	Maximum Hourly Design Rate (MHDR)	VOC Emission Factor (EF)	VOC Emissions (tons)
EU0030	Paint Spraying			(a)
EU0040	71 Natural Gas Space Heaters, 10,279,000 Btu/hr total	0.0098X10 ⁶ scf/hr ¹	5.5 lb/10 ⁶ scf ²	0.24 ³
EU0050	2 Natural Gas Office Heaters, 232,000 Btu/hr total	0.00022X10 ⁶ scf/hr ¹	5.5 lb/10 ⁶ scf ²	0.01 ³
EU0060	Propane Space Heater, 125,000 Btu/hr	0.0014X10 ³ gal/hr ⁴	0.5 lb/10 ³ gal ⁵	0.00 ³
(b) Monthly VOC emissions, in tons:				
(c) 12-month VOC emissions total (e) from Attachment A2 for last month, in tons:				
(d) Monthly VOC emissions (b) from Attachment A2 for same month last year, in tons				
(e) 12-month VOC emissions total, in tons [(b) + (c) - (d)]				

Notes:

1. MHDR in 10⁶scf/hr = $\left(\frac{\text{TotalBtu}}{\text{hr}} \right) \left(\frac{\text{scfNaturalGas}}{1050\text{Btu}} \right) \left(\frac{10^6}{10^6} \right)$
2. Emission factor for natural gas combustion is from Table 1.4-2 in U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition.
3. VOC Emissions = MHDR X EF X (0.0005 ton/lb) X (8760 hr/yr)
4. MHDR in 10³gal/hr = $\left(\frac{\text{TotalBtu}}{\text{hr}} \right) \left(\frac{\text{galPropane}}{90500\text{Btu}} \right) \left(\frac{10^3}{10^3} \right)$
5. Emission factor for propane combustion is from Table 1.5-1 in U.S. EPA document AP-42. TOC is used, since VOC is not available. This errs on the high side, but the result is still insignificant.

Instructions:

- (a) Copy total from Attachment A1 for this month into this box.
- (b) Sum the figures in the above four boxes.
- (c) Copy the 12-month VOC emissions total (e) from Attachment A2 for last month, in tons.
- (d) Copy the monthly VOC emissions (b) from Attachment A2 for same month last year, in tons.
- (e) Calculate the new 12-month VOC emissions total. As a check, this should equal the sum of the monthly VOC emissions (b) for this month and the previous eleven months.

If 12-month VOC emissions total (e) is not more than 99.00 tons, then installation is in compliance with the first emission limitation of Permit Condition PW001.

ATTACHMENT B1
Monthly Individual HAP Emissions Tracking Record
For month of _____, year of _____

For HAP Name: _____ CAS No.: _____ ¹

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

Column A	Column B	Column C	Column D
Material Used (Name, type)	Amount of Material Processed (gallons)	Individual HAP Emission Factor ² (pounds/gallon)	Monthly Individual HAP Emissions ³ (tons)
Additional hexane for Space Heating ⁴			
Additional manganese for Gas Metal Arc Welding ⁴			
Total			
Running 12-Month Total ⁵			

Instructions

1. Duplicate and fill out this form each month for each HAP emitted. Always fill out a form for "HAP Name: Hexane CAS No. 110543", even if it is only to record the additional hexane for space heating. Always fill out a form for "HAP Name: Manganese CAS No.: None", even if it is only to record the additional manganese for gas metal arc welding. If more than ten materials containing a specific HAP are used in one month, use more than one Attachment B1 page for that HAP, but only fill out last two rows on final page.
2. Obtain HAP emission factor from AP-42, FIRE, TANKS or mass balance. (Document source.)
3. Column D = Column B X Column C X 0.0005. Round to two decimal places.
4. For hexane, "Additional hexane for Space Heating" is 0.01. For any other HAP, it is 0.00. For manganese, "Additional manganese for Gas Metal Arc Welding" is 0.03. For any other HAP, it is 0.00. See items 1) and 2) in the "Other Regulatory Determinations" portion of the Statement of Basis for an explanation of these figures.
5. Running 12-Month Total = previous 11 months' Totals + current month's Total

If "Running 12-Month Total" is not more than 9.00 tons for any HAP emitted, then installation is in compliance with the second emission limitation of Permit Condition PW001.

Company Name: Manac Trailers USA Inc.
Installation Location: 8593 State Highway 77, P.O Drawer K Scott County Installation ID: 201-0102

1. Duplicate and fill out this form each month. If more than fifteen individual HAPs are emitted in a single month, use more than one Attachment B2, but only fill out last (total) row on final page.
2. Copy from heading of one Monthly Individual HAP Emissions Tracking Record for this month and year. There will be one row on this B2 form for each B1 form for this month and year.
3. Copy from "Running 12-Month Total" on the same Monthly Individual HAP Emissions Tracking Record.
4. Combined Running 12-Month Total = total of all figures in Column C.

If “Combined Running 12-Month Total” is not more than 24.00 tons, then installation is in compliance with the third emission limitation of Permit Condition PW001.

Method 22 Opacity Emission Observations For EU

[illegible]

ATTACHMENT C2

Method 22 (Outdoor Observation Log)		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

Inspection/Maintenance/Repair/Malfunction Log

[illegible]

ATTACHMENT E

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
YES NO Signature of Observer _____

ATTACHMENT F

Monthly Particulate Matter Tracking Record for Abrasive Blasting (EU0020)

For month of _____, year of _____

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

Pounds of abrasive used this month = _____

Total hours of operation this month = _____

$$\text{EmissionRate} = \left(\frac{\text{lbAbrasive}}{\text{hrOperation}} \right) \left(\frac{28.82 \text{lbPM}^*}{1000 \text{lbAbrasive}} \right) = \text{lbPM / hr}$$

Stack Flow Rate in scf/min = _____

$$\text{Concentration} = \left(\frac{\text{lbPM}}{\text{hr}} \right) \left(\frac{\text{hr}}{60 \text{min}} \right) \left(\frac{7000 \text{gr}}{\text{lb}} \right) \left(\frac{1}{\text{scf / min}} \right) = \text{gr / scf}$$

* The emission factor of 28.82 lb PM/1000 lb abrasive is taken from the 2005 Emission Inventory Questionnaire. It is based on the permittee's engineering calculation.

If Emission Rate is not more than 0.14 lb/hr and Concentration is not more than 0.30 gr/scf, then the installation is in compliance with Permit Condition EU0020-002.

OR

If Concentration is not more than the allowable Concentration determined in option 2) of the Emission Limitation in Permit Condition EU0020-002, then the installation is in compliance with Permit Condition EU0020-002.

ATTACHMENT G1

Monthly Individual Particulate Matter Tracking Record for Paint Spraying (EU0030)

For month of _____, year of _____

For Primer/Paint/Solvent _____

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

Duplicate and fill out this form each month for each different primer, paint, and solvent used during the month.

(A) Gallons of this primer/paint/solvent used this month = _____

(B) Density of this primer/paint/solvent in pounds per gallon = _____

(C) Pounds of this primer/paint/solvent used this month = (A) X (B) = _____

(D) Weight percent solids of this primer/paint/solvent = _____

Note This can be obtained from the Material Safety Data Sheet. If solids content is given in pounds per pound, multiply by 100 to get weight percent. "Solids are sometimes called "nonvolatiles". If not given directly, it can be estimated by subtracting VOC weight percent from 100%, or with the formula

$$WeightPercentSolids = \left[1 - \left(\frac{1}{Paint\ Density\ lb/gal} \right) \left(\frac{lbVOC}{galPaint} \right) \right] [100]$$

(E) Pounds of solids emitted from this primer/paint/solvent this month =

(0.5) X (C) X (D/100) = _____

Note: This assumes a 50% transfer efficiency and no control.

Carry (C) in pounds and (E) in pounds onto Attachment G2 for this month.

For month of _____, year of _____

Installation ID: 201-0102

If Concentration (I) is not more than 0.067 gr/scf, then the installation is in compliance with Permit Condition EU0020-002.

ATTACHMENT H
Demonstration of Compliance With Permit Condition (EU0040 THROUGH EU0060)-002
Page 1 of 2

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

This attachment may be used to demonstrate that emission units EU0040 through EU0060 are in compliance with Permit Condition (EU0040 THROUGH EU0060) - 002, which contains the requirements of regulation 10 CSR 3.060, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*, as long as they burn pipeline grade natural gas, liquefied petroleum gas, or any combination of these fuels.

The PM emission limit in this regulation is based on the total heat input ratings, in MMBtu/hr, of all fuel burning units at the installation and on whether these units are existing or new. The total heat input, Q, of all fuel burning units at this installation is as follows.

10.279 MMBtu/hr — 71 Natural Gas Space Heaters (EU0040)

0.232 MMBtu/hr — 2 Natural Gas Office Heaters (EU0050)

0.125 MMBtu/hr — Propane Space Heaters (EU0060)

10.636 MMBtu/hr

At least some of the heaters were probably installed after February 15, 1971, so they will be treated as new for the purposes of this regulation. The regulation is more stringent for new equipment, so meeting the requirements for new equipment guarantees that the requirements will be met for old equipment too.

10 CSR 10-3.060(5)(B) contains an equation for determining the applicable PM emission limit for new indirect heating sources at an installation when the total heat input for indirect sources is between 10 MMBtu/hr and 2,000 MMBtu/hr:

$$E = 1.31(Q)^{-0.338} = 1.31(10.636)^{-0.338} = 0.59 \text{ lb/MMBtu}$$

where

E = maximum allowable emission rate in pounds per million Btu of heat input, rounded off to two decimal places, and

Q = installation heat input in millions of Btu per hour.

The heaters (EU0040 through EU0060) have a combined heat input of 10.636 MMBtu/hr, so their allowable emission rate is 6.28 lb PM/hr.

ATTACHMENT H
Demonstration of Compliance With Permit Condition (EU0040 THROUGH EU0060)-003
Page 2 of 2

Company Name: Manac Trailers USA Inc.

Installation Location: 8593 State Highway 77, P.O Drawer K

Scott County

Installation ID: 201-0102

Table 1.4.2 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, gives the PM emission factor for natural gas combustion as 7.6 pounds per 10^6 ft³. The heating value of natural gas is 1050 Btu/scf. Calculate the PM emissions for the space heaters and office heaters when burning natural gas as follows.

$$E = \left(\frac{10.636 \text{ MMBtu}}{\text{hr}} \right) \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{7.6 \text{ lb PM}}{10^6 \text{ scf Natural Gas}} \right) = 0.077 \text{ lb PM / hr}$$

Table 1.5.1 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, gives the PM emission factor for propane combustion as 0.6 pounds per 10^3 gal propane. The heating value of propane is 90,500 Btu/gal. Calculate the PM emissions for the space heaters and office heaters when burning liquefied petroleum gas (propane) as follows.

$$E = \left(\frac{10.636 \text{ MMBtu}}{\text{hr}} \right) \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) \left(\frac{\text{gal Propane}}{90500 \text{ Btu}} \right) \left(\frac{0.6 \text{ lb PM}}{10^3 \text{ gal Propane}} \right) = 0.071 \text{ lb PM / hr}$$

The maximum potential PM emission rate of 0.077 lb PM/hr is much less than the allowable emission rate of 6.28 lb PM/hr. Therefore these emission units will be in compliance as long as they burn natural gas, liquefied petroleum gas, or any combination of these two fuels.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received August 9, 2002;
- 2) 2005 Emissions Inventory Questionnaire, received March 29, 2006; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-6.280, Compliance Monitoring Usage

This regulation is now included in all air operating permits as a core permit requirement.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:
None.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart MM, *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations*, does not apply to this installation. This installation produces trailers rather than automobiles or light trucks. These trailers could not meet the definition of light-duty truck in §60.391 of

this regulation even if they were motorized, because they exceed 3,850-kg (8,470lb) gross vehicle weight. The five trailer types made here have the following gross vehicle weights

- 8,500 lb – pup trailer
- 11,500 lb – grain trailer
- 13,500 lb – bottom dump trailer
- 16,000 lb – end dump trailer
- 20,000 lb – trash trailer

No other NSPS regulations apply to this installation.

Maximum Available Control Technology (MACT) Applicability

This installation does not emit 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants. Therefore none of the MACT regulations apply to it.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, *Asbestos Abatement*, 643.225 through 643.250; 10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*; Subpart M, *National Standards for Asbestos*; and 10 CSR 10-6.250, *Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption* apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other NESHAP regulations apply to this installation.

Other Regulatory Determinations

- 1) The figures to be used for “Additional hexane for natural gas and propane combustion” on Attachment B1 can be explained as follows.

Note (a) on Table 1.5-1 in U.S. EPA document AP-42 states that emissions for propane combustion (except SO_x and NO_x) can be assumed to be the same, on a heat input basis, as for natural gas combustion. Total heat input for natural gas and propane combustion at this installation is 10,636,000 Btu, the total of the individual heat inputs for Space Heating (EU0040 through EU0060) from Attachment A2. HAP emissions for natural gas combustion are given in Tables 1.4-3 and 1.4-4 in AP-42. The only HAP emitted in significant amounts is hexane, at 1.8 lb/10⁶ scf. Thus, the maximum hexane emissions for natural gas and propane combustion will be

$$\left(\frac{10,636,000 \text{ Btu}}{\text{hr}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{1.8 \text{ lb Hexane}}{10^6 \text{ scf Natural Gas}} \right) \left(\frac{8760 \text{ hr}}{12 \text{ months}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = \frac{0.01 \text{ lb Hexane}}{\text{month}}$$

The total of all HAPs emitted by natural gas combustion can be found by summing the individual HAP emissions in Tables 1.4-3 and 1.4-4 in AP-42. This gives 1.88 lb/10⁶ scf. Repeating the calculation above with "1.88 lb Total HAP" substituted for "1.8 lb Hexane" still gives a result of 0.01 ton/month. Therefore adding 0.01 ton to the monthly total for hexane is all that is necessary. Emissions of all other HAP from natural gas and propane combustion at this installation are insignificant.

- 2) The figure to be used for "Additional manganese for gas metal arc welding" on Attachment B1 can be explained as follows.

MHDR for Gas Metal Arc Welding (EU0010) is 256 lb E70S electrode/hr. HAP emissions for gas metal arc welding (GMAW) using E70S electrode are given in Table 12.19-2 in AP-42. The only HAP emitted in significant amounts is manganese, at 3.18X10⁻¹ lb/10³ lb. Thus, the maximum manganese emissions for GMAW (EU0010) will be

$$\left(\frac{256 \text{ lb Electrode}}{\text{hr}} \right) \left(\frac{3.18 \times 10^{-1} \text{ lb Manganese}}{10^3 \text{ lb Electrode}} \right) \left(\frac{8760 \text{ hr}}{12 \text{ months}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = \frac{0.03 \text{ ton Manganese}}{\text{month}}$$

The total of all HAPs emitted by GMAW using E70S electrode can be found by summing the individual HAP emissions for that row in Table 12.19-2 in AP-42. This gives 3.21X10⁻¹ lb/10³ lb. Repeating the calculation above with "3.21 X10⁻¹ lb Total HAP" substituted for "3.18X10⁻¹ lb Manganese" still gives a result of 0.03 ton/month. Therefore adding 0.03 ton to the monthly total for manganese is all that is necessary. Emissions of all other HAP from GMAW (EU0010) at this installation are insignificant.

Chapter 12.19, *Electric Arc Welding*, in U. S. EPA document AP-42 does not mention VOC as an emission of concern. Therefore, this permit does not require determining VOC emissions from GMAW (EU0010) or reporting them on Attachment A2.

- 3) Chapter 13.2.6, *Abrasive Blasting*, in U. S. document AP-42 states that particulate matter and particulate HAP are the emissions of concern. It does not mention VOC. Therefore, this permit does not require determining VOC emissions from the Abrasive Blasting (EU0020) or reporting them on Attachments A1 and A2.

According to this chapter, HAP emissions are dependent on both the abrasive used and the surface targeted. The surface targeted is aluminum, which is not a HAP. The abrasive used is a coal slag. Blasting with this slag can be expected to emit less HAP than burning bituminous coal to create it. Emission factors for bituminous coal combustion are available in Tables 1.1-18 and 1.1-19 in AP-42. Summing the emission factors for the eleven of thirteen trace metals in Table 1.1-18 which are HAP, and adding this to the emission factor for non-methane organic compounds from a pulverized coal, wet-bottom boiler gives a total of 0.043 lb HAP/ton coal burned. Using a factor of 0.043 lb HAP/ton abrasive, along with the abrasive throughput figures from the installation's 2005 Emission Inventory Questionnaire allows the following calculation.

$$\left(\frac{26,760 \text{ lb Abrasive}}{2080 \text{ hr}} \right) \left(\frac{\text{ton Abrasive}}{2000 \text{ lb Abrasive}} \right) \left(\frac{8760 \text{ hr}}{\text{yr}} \right) \left(\frac{0.043 \text{ lb HAP}}{\text{ton Abrasive}} \right) \left(\frac{\text{ton HAP}}{2000 \text{ lb HAP}} \right) = 0.0012 \text{ ton HAP / yr}$$

Since HAP is only being tracked to two decimal places, this amount is insignificant, and this permit does not require reporting it on Attachments B1 or B2.

- 4) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
 - a) The emissions from Gas Metal Arc Welding (EU0010) do not exhaust through a stack. Since there is no exhaust stack to observe, this regulation cannot be applied.
 - b) The emissions from Space Heating (EU0040 through EU0060) do not exhaust through a stack. Since there is no exhaust stack to observe, this regulation cannot be applied.
- 5) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This regulation does not apply to Space Heating (EU0040 through EU0060). Per §(1)(A)2, these emission units are exempt because they burn exclusively pipeline grade natural gas or liquefied petroleum gas (propane).
- 6) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This regulation does not apply to Gas Metal Arc Welding (EU0010). The welding is done inside a building and the emissions do not exhaust through a stack. Per §(1)(B)7, the regulation does not apply, because the emissions are fugitive.

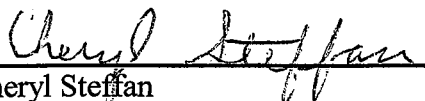
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:


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